

# Holland & Knight

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*Via ECF*

June 5, 2020

Honorable Joseph A. Dickson, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King Jr. Building & U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07102

**Re: *White, et al. v. Samsung Electronics America, Inc., et al.*,  
U.S.D.C., D.N.J., No. 2:17-1775-MCA-JAD**

Dear Judge Dickson:

We are counsel for Defendant Sony Electronics Inc. (“Sony”), in the above-referenced matter.

We write on behalf of all parties in this matter to inform the Court that, in light of Defendants’ pending motions to compel arbitration and Sony’s motion to sever and the Court’s direction (ECF No. 136), the parties have agreed to a discovery plan and a briefing schedule for Defendants’ pending motions, and respectfully request that the Court enter the enclosed Stipulation and Consent Order.

The parties respectfully submit that this schedule is appropriate in light of the parties’ disagreement whether Plaintiffs’ claims are subject to mandatory individual arbitration, which is the subject of Defendants’ pending motions to compel arbitration (ECF Nos. 138, 143). As contemplated by the parties’ agreed-upon schedule, the initial phase of discovery will be limited to Plaintiffs’ individual claims, discovery which may be relevant whether or not Defendants’ motions to compel arbitration are granted.

If the form of the Stipulation and Proposed Order meets with Your Honor’s approval, we ask that it be So Ordered and entered on the docket in this matter.

Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Mark S. Melodia

Mark S. Melodia

Enclosure

cc: All counsel of record (*via ECF*)

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